

UNITED STATES DISTRICT COURT

for the
Western District of North Carolina

CIVIL Division

FILED
CHARLOTTE, NC

JUL 05 2022

US DISTRICT COURT
WESTERN DISTRICT OF NC

MARC HUBBARD

Case No.

(to be filled in by the Clerk's Office)

3:22-cv-302-FDW

Jury Trial: (check one) ☒ Yes ☐ No

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

NATIONSTAR MORTGAGE LLC.
FIRST EQUITIES FINANCIAL LLC.
ASHETH HEMANT PATEL

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	MARC HUBBARD
Street Address	2010 ST. PAUL STREET
City and County	CHARLOTTE MECKLENBURG
State and Zip Code	NORTH CAROLINA 28216
Telephone Number	704-492-8401
E-mail Address	MARCHUBBARD83@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	NATIONSTAR MORTGAGE LLC.
Job or Title <i>(if known)</i>	
Street Address	350 HIGHLAND DRIVE
City and County	LEWISVILLE
State and Zip Code	TX 75067
Telephone Number	
E-mail Address <i>(if known)</i>	75067

Defendant No. 2

Name	FIRST EQUITIES FINANCIAL LLC.
Job or Title <i>(if known)</i>	
Street Address	1517 WONDER DRIVE
City and County	CHAPIN
State and Zip Code	SC 29036
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	ASHETH HEMANT PATEL
Job or Title <i>(if known)</i>	
Street Address	20607 BETHEL CHURCH ROAD
City and County	CORNELIUS MECKLENBURG
State and Zip Code	NC 28031
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* MARC HUBBARD, is a citizen of the
State of *(name)* NORTH CAROLINA.

b. If the plaintiff is a corporation

The plaintiff, *(name)* NATIONSTAR MORTGAGE LLC., is incorporated
under the laws of the State of *(name)* TEXAS,
and has its principal place of business in the State of *(name)*
TEXAS.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* ASHETH HEMANT PATEL, is a citizen of
the State of *(name)* NORTH CAROLINA. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) FIRST EQUITIES FINANCIAL LLC., is incorporated under the laws of the State of (name) NORTH CAROLINA, and has its principal place of business in the State of (name) SOUTH CAROLINA.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

HOUSE IS WORTH 2M

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

DECLARATORY JUDGMENT SEE ATTACHED

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

ORDER DECLARING JABEZ CONSOLIDATED HOLDINGS THE LEGAL OWNER OF THE PROPERTY
LOCATED AT 20607 BETHEL CHURCH ROAD, CORNELIUS NC 28031

MONETARY JUDGMENT AGAINST DEFENDANTS

ANY OTHER RELIEF THE COURT DEEMS FAIR AND JUST

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06/29/2022

Signature of Plaintiff

Printed Name of Plaintiff


MARC HUBBARD

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address